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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Margarita Carrera,

Plaintiff,

v.

Allied Collection Services, Inc.,

Defendant.

Case No.: 2:22-cv-01604-GMN-DJA

**Stipulation and Order to Extend
Discovery Deadlines**

(First request)

Margarita Carrera ("Plaintiff") and Allied Collection Services, Inc. ("Defendant") (jointly as the "Parties"), by and through their respective counsel, hereby stipulate to modify the Court's Discovery Plan and Scheduling Order. Pursuant to LR 26-3(d), the Parties' proposed discovery schedule is listed below:

5. Discovery cutoff date: from June 14, 2023, to **August 14, 2023**;
6. Dispositive motions: from July 14, 2023, to **September 13, 2023**.
7. Pretrial order: from Aug 14, 2023, to **October 13, 2023**.

In the event that dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the Court enters a ruling on the dispositive motions, or otherwise by further order of the Court.

1 Pursuant to LR 26-3, good cause exists to amend the Scheduling Order. The Parties have
2 diligently pursued discovery but need additional time to complete Plaintiff's deposition of
3 Defendant.

4 **A. Statement of Completed Discovery**

5 Plaintiff served initial disclosures, interrogatories, requests for production of documents,
6 requests for admission, and a deposition notice on Defendant on March 20, 2023.

7 Defendant served interrogatories, requests for production of documents, and requests for
8 admission on Plaintiff on March 30, 2023.

9 Defendant served Plaintiff with a Notice of Deposition on March 31, 2023.

10 Plaintiff responded to Defendant's written discovery requests on April 28, 2023.

11 Defendant responded to Plaintiff's written discovery requests on May 8, 2023.

12 Defendant took Plaintiff's deposition on May 18, 2023.

13 **B. Description of Remaining Discovery**

14 Pursuant to LR 26-3(b), the parties request additional time for Plaintiff to take Defendant's
15 Deposition.

16 **C. Reasons Why Remaining Discovery Was Not Completed by Current Deadlines**

17 Pursuant to LR 26-3(c), the reason the remaining discovery was not complete within the
18 time limits set by the discovery plan is that Defendant needed additional time to investigate and
19 respond to Plaintiff's discovery requests which resulted in the parties agreeing to reschedule
20 Plaintiff's deposition of Defendant. Plaintiff and Defendant have been working together to
21 reschedule the deposition within the confines of counsels' schedules as well as Defendant's
22 Witness' schedule.

23 Additionally, Defendant's counsel is currently traveling for an unrelated work matter and
24 Plaintiff's counsel will be traveling out of the country in early July and will not be available to
25 schedule or complete the deposition during that time.

1 This is the Parties' first request for an extension of these deadlines and the Parties
2 respectfully submit that the requested extension is supported by good cause, is made in good faith,
3 and not intended to delay these proceedings unnecessarily.

4 Dated: June 14, 2023.

5 **FREEDOM LAW FIRM, LLC**

6 /s/ Gerardo Avalos
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10 **GORDON REES SCULLY MANSUKHANI, LLP.**

11 /s/ Daniel A. Mann
12 Sean P. Flynn, Esq.
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Counsel for Defendant

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16 **SCHEDULING ORDER**

17 The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for
18 this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.
19

20
21 IT IS SO ORDERED:

22 
23 _____
UNITED STATES MAGISTRATE JUDGE

24 DATED: June 15, 2023
25 _____
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